

allegedly being unpatentable over Sato et al. (U.S. Patent No.: 5,185,712), hereinafter referred to as Sato, in view of Takahashi et al. (U.S. Patent No.: 5,654,756), hereinafter referred to as Takahashi.

With respect to independent claim 1, Applicant submits that neither Sato nor Takahashi, either alone or in combination, teaches or suggests all of the features of Applicant's invention, as recited in claim 1. For example, the combination of these two references do not teach or suggest the claimed step of "displaying the monochromatic image having a higher gradation resolution by reproducing said image data using the R, G and B cells in said color display device," as recited in claim 1. That is, nowhere does either of the two applied references even mention displaying a monochromatic image on a color display device. In fact, the Examiner acknowledges that both Sato and Takahashi are directed to displaying color images. For example, the Examiner states in the fifth full paragraph of the Office Action, starting with "Regarding claims", that Sato teaches forming "full color images" on display sections, and states that Takahashi teaches that a color picture of higher resolution is provided. Therefore, at least based on the foregoing, Applicant submits that independent claim 1 is patentable over the combination of the two applied references.

Applicant submits that independent claim 10 is patentable for reasons similar to those set forth above for claim 1, as claim 10 recites limitations similar to those discussed above with respect to independent claim 1. That is, Applicant submits that neither Sato nor Takahashi, either alone or in combination, teaches or suggests at least a "monochromatic image to be displayed on said color display device," as recited in claim 10.

Additionally, the Applicant asserts the following comments to further distinguish the claimed invention over the applied references. That is, the primary reference, Sato, discloses a liquid crystal viewfinder including a red (R) image display section, green (G) image display section, and blue (B) image display section respectively in different regions within a liquid crystal panel 12, wherein the single color images of R, G and B displayed in respective R, G and B color image display sections are synthesized to obtain a full-color image for viewing. In Sato, each of the R image display section, G image display section and B image display section, displays an image in each different color of R, G and B, unlike the present invention which displays a monochromatic image. Thus, Sato forms a color image and is thus clearly distinctive from the image display method and image display apparatus of the present invention, which are directed to displaying a monochromatic image.

With respect to the secondary reference, Takahashi discloses an image pick-up apparatus for picking up a reflected or transmitted color light (having a plurality of color lights) from a subject with a mono-color image pick-up element to obtain color-field sequential primary chrominance signals of respective colors, which are sequentially converted to output the primary color video signals. Although Takahashi describes converting the color-field sequential primary chrominance signals of respective colors into various color video signals, Takahashi does not disclose displaying a monochromatic image on a color display device, as the present invention does.

Therefore, at least based on the foregoing, even if Sato and Takahasi are combined, at least the features in claims 1 and 10 of the present invention would not be taught or suggested by the combination of the references. Thus, Applicant submits that the applied references, either

alone or in combination, do not teach or suggest the limitations of the claimed invention, as recited in independent claims 1 and 10.

Applicant submits that dependent claims 2-9 and 11-23 are patentable at least by virtue of their respective dependencies from independent claims 1 and 10.

Further, with respect to dependent claims 6, 8, 13, 15, and 21, the Examiner directs Applicant's attention to the Abstract of Takahashi to allegedly support the rejections of these claims. In response, Applicant submits that the Abstract does not teach or suggest the limitations recited in each of claims 6, 8, 13, 15, and 21, and, further, the Examiner fails to even mention the specific limitations of these claims in the Office Action. For example, with respect to claims 6 and 13, Applicant submits that the Abstract of Takahashi does not show and the Examiner never even mentions at least the limitation "wherein data for each of the R, G, and B cells in said input data has been obtained by generally equal allotment," as recited in each of claims 6 and 13. With respect to claims 8 and 15, Applicant submits that the Abstract of Takahashi does not show and the Examiner never even mentions at least the limitation "wherein said input data and a mass of the data for each of R, G, and B cells are used in 1:1 correspondence," as recited in each of claims 8 and 15. Also, with respect to dependent claim 21, Applicant submits that the Abstract of Takahashi does not show and the Examiner never even mentions at least the limitation a processing unit comprising frame memories, a data converting section, and a switching section for sequentially outputting data stored in said frame memories. That is, neither the Examiner nor the Abstract identifies components of Takahashi that satisfy the claimed elements of claim 21. Therefore, at least based on the foregoing, Applicant submits that claims 6, 8, 13, 15, and 21 are patentably distinguishable over Sato and Takahashi.

Further, with respect to the rejections of claims 5, 7, 12, 14, 22, and 23, the Examiner alleges that "Takahashi teaches a control circuit (9) for red, blue and green (ROE, BOE, GOE) signals and supplies them to the memory device (8). See col. 5, line 67 and col. 6, lines 1-10." Applicant submits, however, with respect to claims 5 and 12, that neither the cited portion of Takahashi nor the Examiner discusses the specific limitation "wherein the maximum value of said input data is converted to a sum of values for R, G and B cells and used as a new set of input data," as recited in each of claims 5 and 12. Similarly, with respect to claims 7 and 14, Applicant submits that neither the Examiner nor Takahashi addresses the specific limitations of these claims. That is, the Examiner never even addresses the specific coordinates recited in claims 7 and 14. Also, with respect to claims 22 and 23, Applicant submits that these claims are patentable over the applied references at least because neither the Examiner nor Takahashi even mention data being within a region bounded by at least three coordinates, as described in claims 22 and 23.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

RESPONSE UNDER 37 C.F.R. § 1.111  
U.S. APPLN. NO.: 09/617, 308

ATTORNEY DOCKET NO. Q58739

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

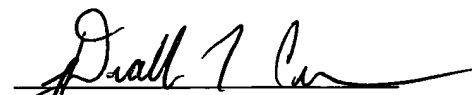
Respectfully submitted,

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

  
Diallo T. Crenshaw  
Registration No. 52,778

Date: November 18, 2003